

**PLAINTIFFS' MEMORANDUM IN OPPOSITION TO DEFENDANTS'
MOTION TO EXCLUDE EXPERT TESTIMONY OF THOMAS MCGUIRE**

EXHIBIT C

JAMES W. HUGHES DEPOSITION TRANSCRIPT (6/20/2019) AT 110:2-11

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL)
5 PRESCRIPTION) MDL No. 2804
6 OPIATE LITIGATION)
7 _____) Case No.
8) 1:17-MD-2804
9)
10 THIS DOCUMENT RELATES) Hon. Dan A.
11 TO ALL CASES) Polster
12)

13 THURSDAY, JUNE 20, 2019

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
15 CONFIDENTIALITY REVIEW

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17 Videotaped deposition of James
18 Hughes, Ph.D., held at the offices of
19 Covington & Burling, LLP, 620 Eighth Avenue,
20 New York, New York, commencing at 9:40 a.m.,
21 on the above date, before Carrie A. Campbell,
22 Registered Diplomat Reporter and Certified
23 Realtime Reporter.

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25 GOLKOW LITIGATION SERVICES
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1 individuals?

2 A. I know a number of them by
3 reputation. You know, I know their names. I
4 don't know them personally.

5 And that would include Jonathan
6 Gruber. There's David Kessler, now I'm on
7 the right one. I know Thomas McGuire.
8 Actually I worked for Thomas McGuire 50 years
9 ago -- not 50, 45 years ago. I know Meredith
10 Rosenthal. And I believe that's it.

11 Q. Okay. In what context did you
12 work for Thomas McGuire?

13 A. So it is 1977, 1978, Professor
14 McGuire is on the faculty of Boston
15 University. I was a master's student in
16 economics at Boston University, and I was
17 assigned to Professor McGuire as his research
18 assistant on some work he was doing. His
19 initial claim to fame research was on mental
20 health, issues involving mental health.

21 So I worked as a research
22 assistant for Professor McGuire for a year
23 and have not -- we haven't laid eyes on each
24 other since.

25 Q. Was that a good experience?

1 A. Yeah, it was fine.

2 Q. Do you respect him as an
3 economist?

4 A. As an economist, yeah, uh-huh.

5 Q. Would you say he has a sterling
6 reputation?

7 A. I have not kept up with his
8 work. I know that -- I mean, I would say
9 that he has a -- I would certainly say that
10 he has a great reputation regarding the
11 economics of mental health. To the extent
12 that he's branched off into other things, I
13 just haven't followed his career in that
14 regard.

15 Q. Fair enough.

16 And I think you said you know
17 Meredith Rosenthal?

18 A. Yes, I do.

19 Q. How do you know her?

20 A. She has been the plaintiff's
21 expert in at least a half a dozen cases where
22 I have worked as defense expert.

23 Q. Okay. Have you met her
24 personally?

25 A. Actually, no.